

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. VICTOR RAY HOLLOWAY,

a/k/a Victor Young,

a/k/a Kevin Click,

2. DIANNE JOSEPHINE CHESS,

3. ANGELA GRACE HINKLE,

a/k/a Angela Grace Holloway, and

4. LARHEA LYNN NAKAO,

a/k/a Larea Holloway,

Defendants.

INDICTMENT CR 12-281 MJD/AJB

(18 U.S.C. § 2)

(18 U.S.C. § 371)

(18 U.S.C. § 641)

(18 U.S.C. § 1001 (a)(2))

(42 U.S.C. § 408(a)(6))

(42 U.S.C. § 408(a)(7)(A))

THE UNITED STATES GRAND JURY CHARGES THAT:

INTRODUCTORY ALLEGATIONS

1. At all relevant times, defendants VICTOR RAY HOLLOWAY, a/k/a Victor Young, a/k/a Kevin Click, DIANNE JOSEPHINE CHESS, ANGELA GRACE HINKLE, a/k/a Angela Grace Holloway, and LARHEA LYNN NAKAO, a/k/a Larea Holloway were residents of the State of Minnesota.

2. At all relevant times, the United States Social Security Administration ("SSA") was a federal government agency responsible for managing an income maintenance program providing monthly benefits to retired or disabled workers and their dependents. A nine digit Social Security Number ("SSN") was devised as a means to keep track of the earnings of individuals working under covered employment. The SSN

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is also used by various government agencies and private organizations for administrative purposes including tax programs, driver's licensing and public assistance. The SSN is a basic record control device within the SSA. The SSN is issued after the SSA receives and processes a completed application. All applicants for original SSNs must present documentary evidence of age, identity, and U.S. citizenship or legal alien status before an application can be processed and a number assigned by the SSA. In addition, all applicants for original SSNs over the age of 18 years must submit to an interview with a SSA representative.

3. At all relevant times, defendant DIANNE JOSEPHINE CHESS ("CHESS"), was employed as a Service Representative of the SSA at a branch office in St. Paul, Minnesota. Her responsibilities as a Service Representative included inputting data and information provided by applicants seeking a Social Security account number into the Social Security Administration's computerized data entry system. Based on the data and information entered into the Social Security Administration's computerized data entry system, the Commissioner of Social Security assigns Social Security account numbers and issues Social Security cards to eligible applicants.

COUNT 1

(Conspiracy to Commit Social Security Fraud)

4. From a date unknown, but at least as early as May 2001, and continuing until in or about June 2010, in the State and District of Minnesota and elsewhere, the defendants,

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VICTOR RAY HOLLOWAY,
a/k/a Victor Young,
a/k/a Kevin Click,
DIANNE JOSEPHINE CHESS,
ANGELA GRACE HINKLE,
a/k/a Angela Grace Holloway, and
LARHEA LYNN NAKAO,
a/k/a Larea Holloway,

did unlawfully and knowingly conspire, combine, confederate and agree with each other and with other persons known and unknown to the Grand Jury to commit an offense against the United States, that is, to willfully, knowingly and with intent to deceive the Commissioner of Social Security as to the true identity of the applicant, furnish and cause to be furnished, to the Commissioner of the Social Security, false information in connection with the establishment of Social Security account numbers and the issuance of Social Security cards, in violation of Title 42, United States Code, Section 408(a)(6).

PURPOSE OF THE CONSPIRACY

5. The purpose of the conspiracy was to furnish to the Commissioner of the Social Security false information in connection with the establishment of Social Security account numbers and the issuance of Social Security cards, in order to fraudulently obtain Social Security account numbers and Social Security cards.

MANNER AND MEANS

6. The purpose of the conspiracy was accomplished, in substance, as follows:

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a. Defendant HOLLOWAY requested defendant CHESS to fraudulently obtain Social Security account numbers and Social Security cards for himself and other coconspirators.

b. Defendant CHESS input into the Social Security Administration's computerized data entry system false information concerning these individuals, including identities, places of birth, citizenship status and whether the applicant, or anyone acting on the applicant's behalf, had ever previously filed for or received a Social Security account number and Social Security card.

c. By entering this false information, defendant CHESS caused the Social Security Administration's computerized data entry system to assign original Social Security account numbers to these individuals and to issue Social Security cards to these individuals even though they were not in fact eligible to receive Social Security account numbers and cards.

d. By entering this false information, defendant CHESS caused the false and fraudulently obtained Social Security cards to be mailed to locations to which she, defendant HOLLOWAY and the other coconspirators had access.

OVERT ACTS

7. In furtherance of the conspiracy and to achieve its purpose, the defendants committed various overt acts within the State and District of Minnesota and elsewhere, including, but not limited to, the following:

a. On or about November 28, 2007, defendant CHESS processed an application for an original Social Security account number to be issued in the name of

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Victor Young by inputting into the Social Security Administration's computerized data entry system false information about Victor Young including identity, place of birth, citizenship status and whether the applicant, or anyone acting on the applicant's behalf, had ever previously filed for or received a Social Security account number and Social Security card.

b. On or about November 28, 2007, defendant CHESS initiated Alphadent and Numident search queries in the name of Victor Young.

c. On or about June 5, 2008, defendant CHESS processed an application for an original Social Security number to be issued in the name of Angela Grace Holloway by inputting into the Social Security Administration's computerized data entry system false information about Angela Grace Holloway including identity, place of birth, citizenship status and whether the applicant, or anyone acting on the applicant's behalf, had ever previously filed for or received a Social Security account number and Social Security card.

d. On or about June 6, 2008, defendant CHESS initiated Alphadent and Numident search queries in the name of Angela Grace Holloway.

e. On or about July 25, 2008, defendant CHESS processed an application for an original Social Security number to be issued in the name of Larea Holloway by inputting into the Social Security Administration's computerized data entry system false information about Larea Holloway including identity, place of birth, citizenship status and whether the applicant, or anyone acting on the applicant's behalf,

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had ever previously filed for or received a Social Security account number and Social Security card.

f. On or about July 29, 2008, defendant CHESS initiated Alphadent and Numident search queries in the name of Larea Holloway.

All in violation of Title 18, United States Code, Section 371.

COUNTS 2-4
(Social Security Fraud)

8. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 7 as though fully stated herein for the purpose of alleging the substantive Social Security fraud offenses alleged in Counts 2 through 4 below.

9. On or about the dates set forth below, in the State and District of Minnesota, the defendants,

VICTOR RAY HOLLOWAY,
a/k/a Victor Young,
a/k/a Kevin Click, and
DIANNE JOSEPHINE CHESS,

along with others known and unknown to the Grand Jury, each aiding and abetting the other, did willfully, knowingly and with intent to deceive the Commissioner of Social Security as to the true identity of the applicant, furnish and cause to be furnished to the Commissioner of Social Security false information in connection with the establishment of original Social Security account numbers and the issuance of Social Security cards, as further described below:

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Count	On or About Date	False Information
2	November 28, 2007	Name, identity, place of birth, citizenship status, and whether the applicant, or anyone acting on behalf of the applicant, ever previously filed for or received a Social Security account number and card.
3	June 5, 2008	Name, identity, place of birth, citizenship status and whether the applicant, or anyone acting on behalf of the applicant, ever previously filed for or received a Social Security account number and card.
4	July 25, 2008	Name, identity, place of birth, citizenship status and whether the applicant, or anyone acting on behalf of the applicant, ever previously filed for or received a Social Security account number and card.

All in violation of Title 18, United States Code, Section 2 and Title 42, United States Code, Section 408(a)(6).

COUNT 5

(Use of False Social Security Number)

10. On or about June 13, 2008, in the State and District of Minnesota, the defendant,

VICTOR RAY HOLLOWAY,

a/k/a Victor Young,

a/k/a Kevin Click,

did willfully, knowingly, and with intent to deceive and obtain a thing of value, use Social Security account number XXX-XX-0211, assigned to the defendant in the name of

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Victor Young by the Commissioner of Social Security, having obtained that Social Security account number on the basis of false information furnished to the Commissioner of Social Security, in an application for a Minnesota ID card in the name Victor Young, submitted to the Minnesota Department of Driver and Vehicle Services, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 6

(Use of False Social Security Number)

11. On or about June 21, 2008, in the State and District of Minnesota, the defendant,

ANGELA GRACE HINKLE,
a/k/a Angela Grace Holloway,

did willfully, knowingly, with intent to deceive, to obtain a thing of value and for any other purpose, use Social Security account number XXX-XX-5974, assigned to the defendant in the name of Angela Holloway by the Commissioner of Social Security, having obtained that Social Security account number on the basis of false information furnished to the Commissioner of Social Security, in an application for a Minnesota ID card in the name Angela Grace Holloway, submitted to the Minnesota Department of Driver and Vehicle Services, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 7

(Use of False Social Security Number)

12. On or about August 2, 2010, in the State and District of Minnesota, the defendant,

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LARHEA LYNN NAKAO,
a/k/a Larea Holloway,

did willfully, knowingly, with intent to deceive, to obtain a thing of value and for any other purpose, use Social Security account number XXX-XX-7788, assigned to the defendant in the name of Larea Holloway by the Commissioner of Social Security, having obtained that Social Security account number on the basis of false information furnished to the Commissioner of Social Security, in an application for employment in the name Larea Holloway, submitted to the Summit Mortgage Corporation, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 8

(Use of False Social Security Number)

13. On or about October 24, 2010, in the State and District of Minnesota, the defendant,

LARHEA LYNN NAKAO,
a/k/a, Larea Holloway,

did willfully, knowingly, with intent to deceive, to obtain a thing of value and for any other purpose, use Social Security account number XXX-XX-7788, assigned to the defendant in the name of Larea Holloway by the Commissioner of Social Security, having obtained that Social Security account number on the basis of false information furnished to the Commissioner of Social Security, in an application for unemployment benefit payments in the name Larea Holloway, submitted to the Minnesota Department of Employment and Economic Development, all in violation of Title 42, United States Code, Section 408(a)(7)(A).

COUNT 9
(False Statements)

14. On or about May 8, 2009, in the State and District of Minnesota, in a matter within the jurisdiction of the executive branch of the government of the United States, specifically, the Department of Housing and Urban Development ("HUD"), the defendant,

LAHREA LYNN NAKAO,
a/k/a Larea Holloway,

did knowingly and willfully make false, fictitious, and fraudulent material statements and representations, in an Initial Information Sheet submitted to the Metropolitan Council Housing and Redevelopment Authority, that the defendant falsely reported and failed to disclose that she was employed and earning wages from the Legacy Management & Development Corporation, all in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT 10
(Theft of Public Money)

15. From on or about May 8, 2009 and continuing until in or about October 2012, in the State and District of Minnesota, the defendant,

LAHREA LYNN NAKAO,
a/k/a Larea Holloway,

did knowingly embezzle, steal, and purloin money and any other thing of value from the United States Department of Housing and Urban Development ("HUD"), a department or agency of the United States, namely, Section 8 housing assistance payments, to which the

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defendant knew she was not fully entitled, having a value of approximately \$16,332, all in violation of Title 18, United States Code, Section 641.

COUNT 11
(Theft of Public Money)

16. From in or about July 2002 and continuing until in or about October 2012, in the State and District of Minnesota, the defendant,

VICTOR RAY HOLLOWAY,
a/k/a Victor Young,
a/k/a Kevin Click,

did knowingly embezzle, steal, and purloin money and any other thing of value from the United States Social Security Administration ("SSA"), a department or agency of the United States, namely, continued payment of Supplemental Security Income ("SSI") disability benefits, to which the defendant knew he was not fully entitled, having a value of approximately \$77,318, all in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATIONS

17. The Grand Jury realleges and incorporates paragraphs 1 through 16 of the Indictment, and makes it a part of these forfeiture allegations.

As the result of the offenses alleged in Counts 10 and 11 of this Indictment, the defendants,

VICTOR RAY HOLLOWAY,
a/k/a Victor Young,
a/k/a Kevin Click, and
LARHEA LYNN NAKAO,
a/k/a Larea Holloway,

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shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 641.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON